

EXHIBIT D

DAVID SHEN Vol. 2 AEO
IN RE TELESCOPES ANTITRUST LIT

September 22, 2023

1

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE TELESCOPES ANTITRUST
LITIGATION,

This Document Relates to:

SPECTRUM SCIENTIFICS LLC, RADIO
CITY, INC., and those similarly
situated,

Plaintiffs,

vs.

CELESTRON ACQUISITION, LLC,
SUZHOU SYNTA OPTICAL TECHNOLOGY
CO., LTD., SYNTA CANADA INT'L
ENTERPRISES LTD., SW TECHNOLOGY
CORP., OLIVON MANUFACTURING CO.
LTD., OLIVON USA, LLC, NANTONG
SCHMIDT OPTIO-ELECTRICAL
TECHNOLOGY CO. LTD., NINGBO SUNNY
ELECTRONIC CO., LTD, PACIFIC
TELESCOPE CORP., COREY LEE, DAVID
SHEN, SYLVIA SHEN, JACK CHEN,
JEAN SHEN, JOSEPH LUPICA, DAVE
ANDERSON, LAURANCE HUEN, and DOES
1-50,

Defendants.

)# 5:20-cv-03639-EJD

)# 5:20-cv-03642-EJD

DEPOSITION OF DAVID SHEN, Volume 2

Friday, September 22, 2023

*** ATTORNEYS' EYES ONLY ***

Reported by:

GWEN S. BRASS, CCR 1908, CSR 5784

JOB NO. J10272332

DAVID SHEN Vol. 2 AEO
IN RE TELESCOPES ANTITRUST LIT

September 22, 2023

26

1 Nantong Schmidt, and neither have I gotten salary from
2 SW. So this question is unanswerable. I never -- I can
3 say that I did not get any salary from Celestron.
4 Neither have I gotten salary from other companies.

5 And for salaries, we have to look at the 10:30
6 timeline. When I was working in Taiwan before, I was
7 collecting a salary from Taiwan. After I got to Suzhou,
8 I started getting a salary from Suzhou. I never went to
9 Canada, and I did not get Canada's salary. Neither have
10 I gone to Nantong Schmidt nor getting a salary from them. 10:30

11 Is this a clear enough explanation?

12 CHECK INTERPRETER: This is the check
13 interpreter speaking.

14 Mr. Shen asked Mr. Borden how come there's a
15 question about salary, and this was because when 10:30
16 Mr. Borden asked about income, the main translator
17 translated that into salary first, and then she
18 backtracked it. So the question sounded like Mr. Borden
19 was asking about salary and then also income.

20 BY ATTORNEY BORDEN: 10:31

21 Q. Yes. So let me re-ask it because I think we
22 had a misunderstanding, Mr. Shen.

23 My question wasn't limited to salary, and it
24 wasn't -- it was about income or revenue.

25 So you explained that you receive dividends 10:31

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

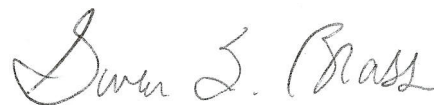
C E R T I F I C A T E

I, GWEN S. BRASS, a Certified Shorthand Reporter within and for the state of California, do hereby certify:

That DAVID SHEN, the witness whose deposition is hereinbefore set forth, was duly sworn by me through the Mandarin interpreter and that such deposition consisting of pages 1 through 109 is a true record of the testimony given through the interpreters by such witness.

I further certify that I am not related to any of the parties to this action by blood or marriage and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 3rd day of October, 2023.



Gwen Brass, CSR 5784